

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
AT BECKLEY**

MATTHEW GIBSON,

Plaintiff,

v.

**Civil Action No. 5:21-cv-00181
Honorable Frank W. Volk**

**LOUISE E. GOLDSTON, individually,
COUNTY COMMISSION OF RALEIGH
COUNTY, a political subdivision, JEFF
MCPEAKE, individually, BRIAN WHITE,
individually, BOBBY STUMP,
individually, KYLE LUSK, individually,**

Defendants.

**DEFENDANT LOUISE E. GOLDSTON'S RESPONSES TO DEFENDANT KYLE
LUSK'S FIRST SET OF REQUESTS FOR ADMISSION**

COMES NOW Defendant, Louise E. Goldston, by and through counsel, Jennifer E. Tully, Adam K. Strider and the law firm of Bailey & Wyant, PLLC and hereby files her responses to Defendant Kyle Lusk's First Set of Requests for Admission and states as follows:

REQUESTS FOR ADMISSION

1. Please admit that you did not engage with Defendant Lusk "in a long-term practice, agreement, relationship and understanding where Defendant Lusk possessed the ability" to request to visit the homes of opposing parties "in order to search and seize items of personal property therein" as alleged by Plaintiff.

RESPONSE: Admit.

2. Please admit that the home visit did not occur "pursuant to a private *ex parte* agreement," as alleged by Plaintiff.

RESPONSE: Admit.

3. Please admit that at the March 4, 2020 hearing on the Petition for Contempt, prior to the home visit, Plaintiff admitted to the Court that he had not handed over certain property that was at issue in the Petition for Contempt.

RESPONSE: Admit.

4. Please admit that you did not use your power and discretion as a Family Court Judge to assist Defendant Lusk.

RESPONSE: Admit.

5. Please admit that Defendant Lusk did not request any assistance or favor from you as a Family Court Judge in exchange for campaign donations, or political and social support.

RESPONSE: Admit.

6. Please admit that you did not agree with and/or engage in concerted action with Defendant Lusk to participate in a conspiracy with Defendant Lusk to deprive Plaintiff of his federally protected rights.

RESPONSE: Admit.

7. Please admit that you did not have a “close relationship” with Defendant Lusk, as alleged by Plaintiff.

RESPONSE: Admit.

8. Please admit that you did not conspire with Defendant Lusk to commit any of the acts alleged in Plaintiff's Complaint.

RESPONSE: Admit.

9. Please admit that, prior to the home visit, you had a preference as a Family Court Judge for the parties to attempt to settle contested matter without court involvement.

RESPONSE: Admit.

**Louise E. Goldston,
By Counsel,**

/s/ Jennifer E. Tully
Jennifer E. Tully (WV Bar #9356)
Adam K. Strider (WV Bar #12483)
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the “**DEFENDANT LOUISE E. GOLDSTON’S RESPONSES TO DEFENDANT KYLE LUSK’S FIRST SET OF REQUESTS FOR ADMISSION**” was electronically filed with the Clerk of the Court using the Court’s Electronic Case Filing (CM/ECF) system, which will send notification of such filing to the following on this day, November 29, 2021:

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John H. Bryan*

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Attorney For: Matthew Gibson

I hereby certify that I have mailed, by United States Postal Service, the to the following on this day, November 29, 2021:

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